

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION

LANDWORKS CREATIONS, LLC.)	C.A. NO.05-CV-40072 FDS
)	
Plaintiff)	
)	
v.)	
)	
UNITED STATES FIDELITY AND GUARANTY)	
COMPANY and)	
LOVETT-SILVERMAN CONSTRUCTION)	
CONSULTANTS, INC.)	
)	
Defendants)	
)	

**DEFENDANT LOVETT-SILVERMAN CONSTRUCTION CONSULTANTS,
INC.'S MOTION TO EXTEND DISCOVERY DEADLINES**

The defendant, Lovett-Silverman Construction Consultants, Inc. ("Lovett-Silverman"), hereby moves this Court pursuant to Rule 6(b) of the Federal Rules of Civil Procedure to extend the tracking order deadlines as follows:

1. Phase One discovery of construction claims, including depositions, shall be completed by **January 26, 2007**.
2. A Status Conference shall be held on **January 26, 2007**, or a date thereafter convenient with the Court.

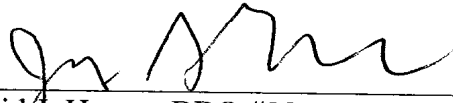
In support of this motion, Lovett-Silverman submits an accompanying memorandum setting forth the reasons for requesting an extension of the discovery and status conference deadlines.

WHEREFORE, Lovett-Silverman requests that this Honorable Court ALLOW this motion and enter an order establishing a pre-trial schedule as requested.

Respectfully submitted,

**LOVETT-SILVERMAN
CONSTRUCTION CONSULTANTS,
INC.**

By its attorneys,

A handwritten signature in black ink, appearing to read 'David J. Hatem', is written over a horizontal line.

David J. Hatem, BBO #225700

Jay S. Gregory, BBO #546708

DONOVAN HATEM LLP

Two Seaport Lane

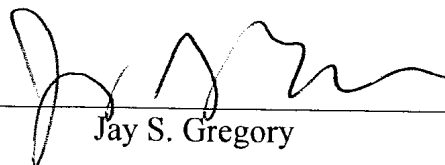
Boston, MA 02210

Dated: September 14, 2006

01032592 (2500.2167)

LOCAL RULE 7.1(a)(2) CERTIFICATE

I, Jay S. Gregory, hereby certify that pursuant to Local Rule of the United States District Court for the District of Massachusetts 7.1(a)(2), counsel have conferred in good faith concerning this motion.

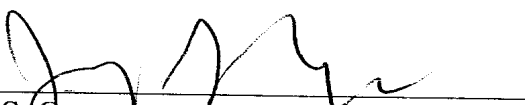

Jay S. Gregory

CERTIFICATE OF SERVICE

I, Jay S. Gregory, hereby certify that on September 21 2006, I have served the attached document by mailing a copy thereof, postage prepaid to:

Robert N. Meltzer, Esquire
Post Office Box #1459
Framingham, MA 01701

Eric Hipp, Esquire
Hermes, Netburn, O'Connor & Spearing
265 Franklin Street
7th Floor
Boston, MA 02110


Jay S. Gregory